

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STARR INDEMNITY & LIABILITY
COMPANY,

Plaintiff,

v.

BRIGHTSTAR CORP., and
BRIGHTSTAR GERMANY GmbH

Defendants.

Case No. 1:13-cv-08580-GHW-GWG

**BRIGHTSTAR CORP. & BRIGHTSTAR GERMANY GmbH'S
RESPONSE TO STARR'S MOTION TO SEAL DOCUMENTS**

Defendants Brightstar Corp. and Brightstar Germany GmbH (collectively, "Brightstar"), for their response to the Motion to Seal Documents filed by Plaintiff, Starr Indemnity & Liability Company ("Starr") on May 31, 2019, state:

1. Starr's Motion seeks to maintain portions of its "Broker Form Guide" under seal for purposes of the parties' pending motions for summary judgment.
2. It is Starr's burden to satisfy the Court that the information it seeks to exclude from public access qualifies for an exception to the "long-established 'general presumption in favor of public access to judicial documents.'" *Bernsten v. O'Reilly*, 307 F. Supp. 3d 161, 165 (S.D.N.Y. 2018) (quoting *Collado v. City of New York*, 193 F. Supp. 3d 286, 288 (S.D.N.Y. 2016)).
3. Given that it is Starr's burden to make the required showing to the Court, and without admitting any of the information Starr seeks to exclude from public access qualifies for such exclusion, Brightstar has no position on whether the information Starr seeks to exclude

from public access should remain excluded and under seal; Brightstar leaves that determination to the Court based on the papers filed by Starr and applicable law.

Date: June 4, 2019

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